

STATE OF INDIANA
MARION COUNTY, ss:

IN THE MARION SUPERIOR COURT
CRIMINAL DIVISION

THE STATE OF INDIANA

vs.

Ryan Worline
W/M DOB: 08/05/1982
CAUSE NO. 49G041204FA022783
(AS TO COUNT(S) I)
Chelsea Taylor
W/F DOB: 06/21/1990
CAUSE NO. 49G041204FA022784
(AS TO COUNT(S) I)

) INFORMATION
) COUNT I
) NEGLECT OF A DEPENDENT
) RESULTING IN DEATH, CLASS A
FELONY I.C. 35-46-1-4

On this date, Detective Robert Flack came before the Prosecuting Attorney of the Nineteenth Judicial Circuit and, being duly sworn (or having affirmed), stated that in Marion County, Indiana

COUNT I

Ryan Worline and Chelsea Taylor, each being at least eighteen (18) years of age, did, on or about January 16-18, 2012, having the care of Jayden Noel, a dependent approximately one (1) year of age and having a date of birth of December 15, 2010, knowingly place Jayden Noel in a situation that endangered the life or health of Jayden Noel, that is, failed to check on the welfare of Jayden Noel and/or failed to obtain prompt medical attention for Jayden Noel after Jayden Noel had sustained multiple recent and acute blunt force traumatic injuries and, further, that said acts resulted in death to Jayden Noel;

all of which is contrary to statute and against the peace and dignity of the State of Indiana.

I swear or affirm under penalty of perjury as specified by I.C. 35-44-2-1 that the foregoing representations are true.

Robert Flack
Affiant

4/5/2012
Date

TERRY R. CURRY
Marion County Prosecutor
19th Judicial Circuit

[Signature]
Deputy Prosecuting Attorney

State's Witnesses:

Detective Robert Flack, IMPD, F3439
Detective William Rogers, IMPD, R0188
Detective Marcus Kennedy, IMPD, K2692
Detective Grant Melton, IMPD, 20293
Lynn Redd, MCCL, M6458
Don Toth, MCCL, T8280
Dr. Ken Obenson, MCCO
Marilyn Schaler, MCCL, S1494
Jerraco Noel
Danielle Hardwick
Emmy Jackson
Katy Bird
Frances Crookshanks
Paul Crookshanks
Clint Bird
Tomasina Trice
Carrie Johnson
Kimberly Highsaw

AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF MARION, SS:

Robert Flack swears (affirms) that:

On 01-18-12 at approximately 12:08 P.M. I.M.P.D. Officer Lee responded to a report of an unconscious baby not breathing at 4858 Lakeshore Pl., Apt. 3123, Indianapolis, Marion County, Indiana. Officer Lee arrived at 4858 Lakeshore Pl., Apt. 3123 at 12:10 P.M. Officer Lee stated that he observed a subject, later identified at Ryan Worline, performing CPR on the infant. Officer Lee advised that the medics arrived at the apartment at 12:12 P.M. The medics pronounced the victim, Jayden Noel, W/M/1, DOB of 12-15-10, deceased at 12:14 hrs.

Det. Kennedy, Det. Rogers and I arrived at the scene. The victim, Jayden Noel, was observed lying on the floor in the living room of the apartment dressed in a diaper. The victim's mother, Chelsea Taylor, and her live in boy friend, Ryan Worline, were also in the apartment. Deputy Coroner Lloyd Sprowl advised me at 1:45 P.M. that the temperature in the apartment was 73 degrees and the victim's body temperature was 74.3 degrees. Det. Kennedy stayed at the scene with crime lab tech Lynn Redd and crime lab supervisor Don Toth while Det. Rogers and I went to the Family Advocacy Center located at 4134 N. Keystone Ave. to interview the victim's mother, Chelsea Taylor and her boy friend, Ryan Worline.

Det. Rogers and I arrived at the Family Advocacy Center at 2:30 P.M. We met Child Abuse Sgt. Kinder who advised us that Det. Grant Melton would assist us with interviewing Chelsea Taylor and Ryan Worline.

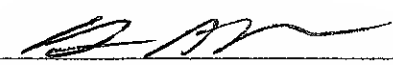
Det. Melton and I started interviewing Chelsea Taylor at 3:30 P.M. while Det. Rogers observed the interview from an observation room.

Chelsea Taylor stated that she worked at her job on 01-17-12 from 5:00 P.M. until 10:00 P.M. Chelsea Taylor arrived at her apartment just after 10:00 P.M. and checked on her son Jayden Noel and her boy friend's daughter, Addison Worline, age 2 (DOB of 1-21-10). Chelsea Taylor said that both children were fine. Chelsea Taylor said she slept on the couch in the living room while Ryan Worline slept in their bed. Chelsea Taylor said she woke up around 5:00 A.M. and got into bed with Ryan Worline. Chelsea Taylor said she woke up around 9:00 A.M. to 9:30 A.M. but didn't check on the kids until she heard Addison Worline at around noon (just before the 911 call). Chelsea Taylor said that when she checked on Addison Worline, she found her son, Jayden Noel, unresponsive. Chelsea Taylor said she called for Ryan Worline and started CPR on her son. Chelsea Taylor said that Ryan Worline came into

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.


AFFIANT

DATED: 04-05-2012


DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

From: Robert Flack

Robert Flack
AFFIANT

Affidavit for Probable Cause

From: Robert Flack

01-17-11 when he had his scheduled visitation. He met Chelsea Taylor at the club house of her apartment complex. Jerraco Noel said he noticed some blood around Jayden's nose, and some bumps on his head and a scratch in the corner of his eye. Chelsea Taylor told him that Jayden fell into a wall.

On 01-19-12 at 8:30 A.M., I attended the autopsy of Jayden Noel, a human being. Dr. Ken Obenson ruled that the cause of death was as the result of multiple blunt force traumatic injuries to the head and ruled that the manner of death was a homicide. Specifically, Dr. Obenson noted the following: (1) an acute linear fracture of the skull and right parieto-occipital bones; (2) a cerebral edema, diffuse, with an acute subarachnoid hemorrhage; (3) a recent right sided subdural hematoma; (4) a fracture of the clavicle with callus formation; and (5) multiple recent bruises to the trunk and extremities. Dr. Obenson indicated that the skull fracture with cerebral edema and subarachnoid hemorrhage were acute, placing the injuries within, but not more than 48 hours. Further testing was conducted by or at the request of Dr. Obenson from January 19th to April 4, 2012 which the final autopsy report was issued.

I returned to the Homicide Office and made several attempts to contact Ryan Worline. I advised his brother, Jamie Worline that I needed Ryan Worline to contact me.

I contacted John Taylor, Chelsea Taylor's father at 2:40 P.M. and advised him that I needed to talk to Chelsea Taylor.

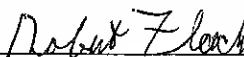
Chelsea Taylor arrived at the Homicide office with her parents, John and Vickie Taylor.

Det. Rogers and I took another statement from Chelsea Taylor at 3:45 P.M. Det. Rogers and I advised Chelsea Taylor that her son was the victim of a homicide. During the course of the interview, Chelsea Taylor repeated her account of what happened on 01-17-12 and 01-18-12. Chelsea Taylor added that she worked at her job on 01-16-12 from 4:30 P.M. to 8:30 P.M. Chelsea Taylor stated that she never saw any bruising or injuries on her son. Chelsea Taylor completed her statement at 4:30 P.M.

Det. Rogers and I went to 1100 N. W. 11th St. on 01-19-12 at 6:00 P.M. which is Jamie Worline's residence. We contacted Ryan Worline and told him that we wanted to discuss some new information with him regarding the investigation. Ryan Worline said he hired an attorney. Det. Rogers and I left Jamie Worline's residence.

On 01-21-12 I contacted a Danielle Hardwick, who is Addison Worline's mother, at her residence at 1:50 P.M. for an interview. Danielle Hardwick said that Ryan Worline is Addison Worline's father. Danielle Hardwick said she was contacted by a CPS case worker on 01-18-12 and told about Jayden Noel's homicide. The case worker asked her to pick up her daughter, Addison Worline. Danielle Hardwick said she knows Chelsea Taylor. Danielle Hardwick said that her relationship with Ryan Worline was off and

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.



AFFIANT

DATED: 04-05-2012



DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

Affidavit for Probable Cause

From: Robert Flack

on due to his temper. Danielle Hardwick talked about one incident that caused her to hide in a bathroom with her daughter Addison Worline. She said that Ryan Worline was screaming and yelling at her.

On 01-22-12 at 11:10 A.M., I took a statement from Emmy Jackson who lives in the same apartment building in which Chelsea Taylor and Ryan Worline lived. Emmy Jackson said that she and her cousin Katy Bird have lived in their apartment since Sept. 2011. Emmy Jackson said that since that time, she had heard the man and woman in apartment 3123 arguing and verbally fighting almost daily and has heard a couple of big blowups about twice a month. Emmy Jackson further stated that she has constantly heard a baby crying. Emmy Jackson then said that she and Katy Bird arrived home on 01-17-12 around 8:45 to 9:00 P.M. She said that she heard something like weights being dropped on the floor above them. Emmy Jackson said she went upstairs and knocked on the door. She then heard a kid come to the door and slap its hands on the door. Emmy Jackson then said that she heard a male's voice quietly say "come here." Emmy Jackson then returned to her apartment.

I took a statement from Katy Bird, who lives with Emmy Jackson at 11:25 A.M. Katy Bird said she has heard loud verbal arguments between a male and female about twice a week since she has lived in her apartment. Katy Bird said that she heard a child crying a few weeks ago while the male and female were arguing. Katy Bird said that she and Emmy Jackson arrived home on 01-17-12 around 8:45 to 9:00 P.M. Katy Bird said she heard a loud banging noise like weights being dropped on the floor about every two minutes for about twenty minutes.


I took a statement from Frances Crookshanks, who lives in the same apartment building at 12:00 P.M. Mrs. Crookshanks said she was home on 1-17-12 and heard loud thumping noises from the apartment upstairs during the evening for several hours. Mrs. Crookshanks said she has heard a male and female yelling at each other and at a little girl. Mrs. Crookshanks then said that about three weeks ago, she and her husband, Paul Crookshanks, were leaving their apartment when she heard some yelling upstairs and heard a female voice yell "one of these days, I'm going to kill you."

I then took a statement from Paul Crookshanks at 12:15 P.M. Mr. Crookshanks said that he and Mrs. Crookshanks were leaving their apartment about a month ago and heard a male and female voice, then heard a child crying.

I took another statement from Danielle Hardwick on 01-24-12 at 2:00 P.M. Danielle Hardwick stated that she texted Ryan Worline on Chelsea Taylor's phone on 01-18-12 at 9:06 A.M. to discuss their daughter, Addison Worline's birthday party. Danielle Hardwick said that they exchanged several texts until 11:07 A.M. Danielle Hardwick said that was the last contact she had that morning. Danielle Hardwick said she continued to text Ryan Worline that day but did not receive any response.

Danielle Hardwick contacted me on 01-26-12 at 1:00 P.M. and stated that Ryan Worline called her on

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.


AFFIANT

DATED: 04-05-2012


DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE

Affidavit for Probable Cause

From: Robert Flack

01-24-12 around 6:45 P.M. Ryan Worline told her that he didn't text her on the morning of 01-18-12 that Chelsea Taylor did the texting regarding Addison Worline's birthday party.

On 2-1-12 I arrived at Logan's Roadhouse, 4825 E. 82nd Street, and met with the manager who introduced me to Tomasina Trice, an employee. Trice stated that on 1-17-12 at 8:21 p.m. she clocked out and that Chelsea Taylor clocked out just before her. Trice stated that she and Taylor then got something to eat. Trice said that she and Taylor left the restaurant together at the same time, just before 9:00 p.m. Logan's Roadhouse is across the street, just to the west, of Lakeshore Apartments, which is where 4858 Lakeshore Pl., Apt. 3123 is located.

Ryan Worline, while not the biological father of Jayden Noel, had been living with Chelsea Taylor for at least several months, having signed a joint lease agreement for that apartment in Lakeshore Apartments on August 31, 2011. Jayden Noel lived with Worline and Taylor during this time period.

All of the above events occurred in Marion Co., Indiana.

I swear (affirm), under penalty of perjury as specified by IC 35-44-2-1, that the foregoing representations are true.

Robert Flack
AFFIANT

DATED: 04-05-2012

[Signature]
DEPUTY PROSECUTING ATTORNEY
NINETEENTH JUDICIAL CIRCUIT

JUDGE